

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

TAMEKA GOODEN,

Plaintiff,

v.

**Case No. 2:23-cv-02493-MSN-atc
Jury Demanded**

**BAPTIST MEMORIAL COLLEGE OF
HEALTH SCIENCES, INC. d/b/a
BAPTIST HEALTH SCIENCES UNIVERSITY,**

Defendant.

**REPORT OF THE PARTIES' PLANNING CONFERENCE
AND PROPOSED DISCOVERY PLAN**

In compliance with Federal Rule of Civil Procedure 26(f) and Local Rules 16 and 26, Plaintiff, Tameka Gooden ("Plaintiff"), and Defendant, Baptist Memorial College of Health Sciences, Inc. d/b/a Baptist Health Sciences University ("Defendant"), hereby submit the following Report of the Parties' Planning Meeting and Proposed Discovery Plan.

By presenting this Report and Discovery Proposal, none of the parties waive or shall be estopped from asserting any claim, defense, or argument, or from offering any evidence or advancing any legal theory in this matter.

1. The following persons participated in the Rule 26(f) conference:
 - a. James R. Becker, Jr., counsel for Plaintiff
 - b. Paul E. Prather, counsel for Defendant
 - c. Meghan M. Cox, counsel for Defendant

2. Initial Disclosures. The parties will complete the initial disclosures required by Rule 26(a)(1) by December 29, 2023.
3. Discovery Plan. The parties propose this discovery plan:
 - a. Discovery will be needed on Plaintiff's claims, Defendants' defenses, alleged liability, and alleged damages.
 - b. Discovery should be completed by July 19, 2024, according to the Scheduling Order.
 - c. The parties will comply with the default standards described in Local Rule 26.1(e) regarding discovery of electronically stored information ("e-discovery") until such time, if ever, the parties reach an agreement and the Court approves the parties' e-discovery plan.
 - d. Pursuant to agreement of the parties, if privileged or protected information is inadvertently produced, the producing party may, by timely notice, assert the privilege or protection and obtain the return of the materials without waiver.
 - e. The parties agree that each side may serve 25 interrogatories, as provided by the Federal Rules of Civil Procedure, and responses will be due 30 days after issuance, unless otherwise agreed between the parties or extended by the Court. Interrogatories must be served in sufficient advance to allow for a response by the deadline for interrogatories set forth in the scheduling order.
 - f. The parties agree that each side may serve 25 requests for admissions, and responses will be due 30 days after issuance, unless otherwise agreed between the parties or extended by the Court. Admission requests must be served in sufficient

advance to allow for a response by the deadline for admissions set forth in the scheduling order.

- g. The parties agree that each side may take 10 depositions, as provided by the Federal Rules of Civil Procedure, unless otherwise agreed between the parties or permitted by the Court.
 - h. The parties shall, if necessary, supplement their responses to discovery pursuant to Rule 26(e) in a timely manner and in any event by the date set by this Court for the close of discovery, July 19, 2024, unless otherwise order by the Court.
4. Other items:
- a. The parties request that a final pre-trial conference be set for a date shortly before, but sufficiently in advance of, the trial date set by this court so that the parties may complete their trial preparations based upon any motion rulings or other instructions from the Court at the pretrial conference.
 - b. The parties have until February 15, 2024, to file motions to amend their pleadings and to join additional parties unless otherwise agreed to by the parties and approved by the Court.
 - c. The parties have until August 16, 2024, in which to file dispositive motions.
 - d. The parties agree to participate in ADR pursuant to the Scheduling Order and the Local Rules of this Court and may attempt settlement negotiations as discovery progresses.
 - e. This case is set for a non-jury trial and is anticipated to last three (3) days.

Respectfully submitted,

/s/ James R. Becker, Jr.

James R. Becker, Jr. (BPR #016582)

Attorney for Plaintiff

1038 Oakhaven Road

Memphis, Tennessee 38119

(901) 881-6205

jrb@beckerlawfirm.net

/s/ Meghan M. Cox

Paul E. Prather (BPR #010089)

Meghan M. Cox (BPr #33028)

Attorneys for Defendant

Littler Mendelson, P.C.

3725 Champion Hills Dr., Ste. 3000

Memphis, TN 38125

pprather@littler.com

mecox@littler.com